

1	Under Civil L.R. 7-12 and 6-1(b), Plaintiff Anthony Trupia and Defendant X Corp.
2	(collectively, "Parties") stipulate and respectfully request an order changing X Corp.'s deadline
3	to file a responsive pleading to Plaintiff's First Amended Complaint (ECF No. 34-1; the "FAC")
4	from January 5, 2026 to January 21, 2026.
5	WHEREAS, on April 28, 2025, Plaintiff filed his Complaint (ECF No. 1);
6	WHEREAS, on September 24, 2025, Defendant X Corp. filed a Motion to Dismiss or
7	Transfer (ECF No. 22), which was fully briefed on December 8, 2025;
8	WHEREAS, on December 9, 2025, Plaintiff filed a Motion for Leave to File Amended
9	Complaint (ECF No. 34; "Motion for Leave to Amend");
10	WHEREAS, on December 22, 2025, the Court granted Plaintiff's Motion for Leave to
11	Amend (ECF No. 35); ¹
12	WHEREAS, the Court's December 22, 2025 order set Defendant X Corp.'s deadline to
13	file a responsive pleading to the FAC as January 5, 2026;
14	WHEREAS, before the Court's December 22, 2025 order, X Corp.'s counsel already
15	scheduled a previously planned family vacation to occur between December 26, 2025 and
16	January 5, 2026 (see Declaration of Kenneth M. Trujillo-Jamison ¶ 3);
17	WHEREAS, in the period when X Corp. would need to prepare its responsive pleading,
18	the availability of employees relevant to X Corp.'s response will be impacted by the intervening
19	holiday season (see id.);
20	WHEREAS, Plaintiff and counsel for Defendant X Corp. have met and conferred, and
21	agree that X Corp.'s deadline to file a responsive pleading to the FAC should be reset from
22	January 5, 2026 to January 21, 2026 (see id. ¶ 4);
23	WHEREAS, the only previous time modifications in this case were (a) the Court's sua
24	sponte resetting of the case management conference in this case (see ECF Nos. 14, 31); and
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26	Defendent V.Commenter that the Constructed District Co. Matter Co. Lancata Annual
27 28	Defendant X Corp. submits that the Court granted Plaintiff's Motion for Leave to Amend before its time in which to file an opposition had elapsed under Local Rule 7-3(a). Under that Rule, Defendant's deadline to respond to the Motion for Leave to Amend was December 23, 2025.

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1	(b) the Court's order extending the deadlines for Plaintiff's opposition to X Corp.'s Motion to
2	Dismiss or Transfer and X Corp.'s deadline to file a reply in support of that motion (ECF No.
3	29);
4	WHEREAS, the extension requested in this motion will not have any effect on the
5	schedule for this case;
6	THEREFORE, IN LIGHT OF THE FOREGOING, THE PARTIES HEREBY
7	STIPULATE AND REQUEST THAT:
8	The deadline for Defendant X Corp. to file a responsive pleading to the FAC shall be
9	changed from January 5, 2026 to January 21, 2026.
10	Respectfully submitted,
11	Dated: December 23, 2025 WILLENKEN LLP
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13	By: <u>/s/ Kenneth M. Trujillo-Jamison</u> Kenneth M. Trujillo-Jamison
14	Attorneys for Defendant X Corp.
15	Dated: December 23, 2025
16	
17	By: <u>/s/ Anthony Trupia</u> Anthony Trupia
18	Plaintiff appearing pro se
19	PURSUANT TO STIPULATION, IT IS SO CROSE STRICT
20 21	Dated:
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24	Judge Noël Wise Judge Noël Wise
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26	DISTRICT OF CE
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